

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

EURAL SCURLARK,

Plaintiff,

v.

QUALITY ASSET RECOVERY, LLC,

Defendant.

Case No.: 5:20-cv-01242-JKP-HJB

**SCHEDULING RECOMMENDATIONS**

Pursuant to Federal Rule of Civil Procedure 16, the parties submit the following proposed scheduling recommendations:

1. Initial Disclosures: Unless exempted from initial disclosures through Federal Rule of Civil Procedure 26(a)(1)(B), all parties that have appeared in this action shall make their required Rule 26(a)(1) disclosures on or before **February 24, 2021**. To the extent a defendant knows the identity of a responsible third party contemplated by Texas Civil Practices & Remedies Code 33.004, such identity is subject to disclosure under Rule 26(a)(1)(A)(i).

2. Alternative Dispute Resolution (“ADR”): The parties shall file a report on alternative dispute resolution in compliance with Local Rule CV-88 on or before **May 11, 2021**.

3. Offer of Settlement: Parties asserting claims for relief shall submit a written offer of settlement to opposing parties on or before **May 11, 2021**, and each opposing party shall respond, in writing on or before **May 25, 2021**. All offers of settlement are to be private, not filed. The parties are ordered to retain the written offers of settlement and response as the Court will use these in assessing attorney’s fees and costs at the conclusion of the proceedings. If a settlement is reached, the parties should immediately notify the Court, so the case may be closed.

4. Amend/Supplement Pleadings, Joinder of Parties: On or before **June 10, 2021**, the parties shall file any motion seeking leave to amend or join parties.

5. Designation of Experts: Parties asserting claims for relief shall file their designation of testifying experts and serve on all parties, but not file the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) on or before **May 11, 2021**.

6. Designation of Experts (Continued): Parties resisting claims for relief shall file their designation of testifying experts and serve on all parties, but not file the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) on or before **June 25, 2021**.

7. Rebuttal of Experts: Parties shall file all designations of rebuttal experts and serve on all parties, the material required by Federal Rule of Civil Procedure 26(a)(2)(B) for such rebuttal experts, to the extent not already served, **within 14 days of receipt** of the report of the opposing expert.

8. Discovery Deadline: Parties shall initiate all discovery procedures in time to complete discovery on or before **August 9, 2021**.

9. Settlement Negotiations Status Report: Counsel shall confer and file a joint report setting forth the status of settlement negotiations on or before **August 23, 2021**.

10. Dispositive Motions Deadline: All dispositive motions must be filed by **September 8, 2021**. Dispositive motions, and responses to dispositive motions, must be limited to 20 pages in length which is the standard page limit for this Court. (*See* WDTX, SA Div., Local Rule CV-7(h).)

11. Pretrial Conference and Trial: The District Court will set dates for trial and the final pretrial conference after receiving and reviewing filed dispositive motions or after the deadline for such motions passes without a pertinent filing. At that time, it will likewise set appropriate deadlines for trial and pretrial conference matters.

Dated: February 5, 2021

/s/ Mohammed O. Badwan

Mohammed O. Badwan, Esq.  
SULAIMAN LAW GROUP, LTD.  
2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148  
+1 630-575-8180  
mbadwan@sulaimanlaw.com  
*Attorney for Plaintiff*

Respectfully submitted,

/s/ Jason R. Jobe

Jason R. Jobe  
State Bar No. 24043743  
THOMPSON, COE, COUSINS & IRONS,  
L.L.P.  
Email: jjobe@thompsoncoe.com  
Plaza of the Americas  
700 N. Pearl Street, 25th Floor  
Dallas, Texas 75201-2832  
Telephone: (214) 871-8200  
Telecopy: (214) 871-8209  
*Attorney for Defendant*

### **CERTIFICATE OF SERVICE**

I, Mohammed O. Badwan, an attorney, certify that on February 5, 2021, the foregoing document was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Mohammed O. Badwan